

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

**IN RE:  
FTX CRYPTOCURRENCY EXCHANGE  
COLLAPSE LITIGATION**

No. 1:23-md-03076-KMM  
MDL No. 3076

This Document Relates To:

*Garrison v. Wasserman Media Group, LLC  
and Dentsu McGarry Bowen LLC,  
No. 23-cv-24478-KMM*

**UNOPPOSED MOTION BY DEFENDANT DENTSU MCGARRY BOWEN LLC TO  
EXCEED BRIEFING PAGE LIMIT FOR ITS MOTION TO DISMISS**

Defendant, Dentsu McGarry Bowen LLC (“DentsuMB”), by and through undersigned counsel and pursuant to Local Rule 7.1(c)(2), hereby files this unopposed Motion for leave to exceed the twenty (20) page limitation set forth by the Local Rule and to file a forthcoming Motion to Dismiss no longer than forty-two pages (excluding exhibits) and in support thereof respectfully refers the Court to the following Memorandum of Law.

**MEMORANDUM OF LAW**

**II. INTRODUCTION**

Under the Local Rules, DentsuMB would be entitled to twenty (20) pages for their individual Motion to Dismiss. *See* S.D. Fla. L.R 7.1(c)(2). However, the Class Action Complaint (the “Complaint”) for the above-styled matter, is one hundred forty-three (143) pages long, containing two hundred eighty-two (282) factual allegations, fourteen (14) causes of action against DentsuMB, and contains extensive exhibits. The additional length for the Motion to Dismiss is

necessary in this instance to adequately address the volume, scope, and specificity of the factual allegations, claims, and issues raised in the operative Complaint.

## **II. ARGUMENT**

It is within this Court's discretion and inherent authority to allow DentsuMB to exceed the page limitation requirements of Local Rule 7.1. Pursuant to the Local Rule, “[a]bsent prior permission of the Court, neither a motion and its incorporated memorandum of law nor the opposing memorandum of law shall exceed twenty (20) pages....” S.D. Fla. L.R. 7.1(c)(2). The Local Rule therefore authorizes this Court to grant leave to file a motion to dismiss in excess of the twenty-page limit set forth above.

DentsuMB will endeavor to keep its forthcoming Motion to Dismiss succinct and to the point. However, given the numerous issues, claims, and supporting exhibits in the operative Complaint, DentsuMB is requesting leave to exceed the twenty-page limit set forth by the Local Rule to adequately and completely address each factual and legal basis set forth in their Motion. However, given the significant and necessary information set forth in the Plaintiffs' Class Action Complaint, DentsuMB seeks leave to file a Motion to Dismiss no longer than forty-two pages (excluding exhibits).

## **III. CONCLUSION**

WHEREFORE, with respect to the forthcoming Motion to Dismiss, Defendant, Dentsu McGarry Bowen LLC, respectfully requests that this court **GRANT** its Motion, and enter an Order allowing Dentsu McGarry Bowen LLC to exceed the twenty (20) page limit of Local Rule 7.1(c)(2) and file a Motion to Dismiss no longer than forty-two (42) pages.

**LOCAL RULE 7.1(a)(3) CERTIFICATION**

Pursuant to Local Rule 7.1(a)(3), counsel for the Defendant, Dentsu McGarry Bowen LLC, has conferred with plaintiffs' counsel, Brooke A. Alexander, Esq., who has no objection to the relief requested in this Motion.

DATED: February 26, 2024

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC



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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 26th day of February, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a Notice of Electronic Filing to all counsel of record.

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